

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**LAVETTE COOPER and IVORY
COOPER, Individually and on behalf of all
others similarly situated,**

Plaintiffs,

v.

**ALL AMERICAN HOME CARE LLC,
ALL AMERICAN HOSPICE CARE LLC,
MICHAEL SPIVAK,**

Defendants.

Case No. 2:17-cv-01563-PBT

**JERRY ACOSTA, JR. and MODESTINE
THORPE, Individually and on behalf of all
others similarly situated,**

Plaintiffs,

v.

ALL AMERICAN HOME CARE LLC,

Defendant.

Case No. 2:17-cv-01656-PBT

**PLAINTIFFS' UNOPPOSED MOTION FOR
APPROVAL OF ATTORNEYS' FEES AND COSTS**

Pursuant to Federal Rule of Civil Procedure 23(h), Class Counsel for Plaintiffs Lavette Cooper, Ivory Cooper (the “Cooper Plaintiffs”), Jerry Acosta, Jr. and Modestine Thorpe (the “Acosta Plaintiffs”) (collectively, “Plaintiffs” or “Named Plaintiffs”), individually and on behalf of all others similarly situated, respectfully seek reimbursement for attorneys’ fees in the amount of One Hundred Thirty-Three Thousand, Three Hundred Thirty-Three Dollars and Thirty-Three Cents (\$133,333.33) (which is one-third of the Gross Settlement Amount), and the payment of out-of-pocket costs incurred by Class Counsel, which currently are \$4,558.67, as established by the

Settlement Agreement between Named Plaintiffs and Defendants All American Home Care LLC, All American Hospice Care LLC, and Michael Spivak (together “All American” or “Defendants”).

This Motion is based on the accompanying Memorandum of Law, the Declarations of Class Counsel, and all other records, pleadings and papers on file in this action. Pursuant to the terms of the Settlement Agreement, Defendants do not oppose this Motion. Named Plaintiffs will submit a proposed Order in connection with their Motion for Final Approval of the Settlement in February, 2019.

Dated: November 19, 2018

Respectfully Submitted,

/s/ Marc P. Weingarten

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*Attorneys for Plaintiffs Jerry Acosta, Jr.,
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served upon counsel for Defendant through the Court's ECF system this 19th day of November, 2018.

/s/ Sarah R. Schalman-Bergen
Sarah R. Schalman-Bergen